

**STATISTICAL INFORMATION ONLY: Debtor must select the number of each of the following items included in the Plan.**

1 ☒ Valuation of Security 0 Assumption of Executory Contract or Unexpired Lease 0 Lien Avoidance

Last revised: December 1, 2017

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In Re:  
JORGE PARADES

Case No.: 18-18975

Judge: Meisel

Debtor(s)

**Chapter 13 Plan and Motions**

☐ Original

☒ Modified/Notice Required

Date: 08/23/2018

☐ Motions Included

☐ Modified/No Notice Required

**THE DEBTOR HAS FILED FOR RELIEF UNDER  
CHAPTER 13 OF THE BANKRUPTCY CODE**

**YOUR RIGHTS MAY BE AFFECTED**

You should have received from the court a separate *Notice of the Hearing on Confirmation of Plan*, which contains the date of the confirmation hearing on the Plan proposed by the Debtor. This document is the actual Plan proposed by the Debtor to adjust debts. You should read these papers carefully and discuss them with your attorney. Anyone who wishes to oppose any provision of this Plan or any motion included in it must file a written objection within the time frame stated in the *Notice*. Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated. This Plan may be confirmed and become binding, and included motions may be granted without further notice or hearing, unless written objection is filed before the deadline stated in the *Notice*. The Court may confirm this plan, if there are no timely filed objections, without further notice. See Bankruptcy Rule 3015. If this plan includes motions to avoid or modify a lien, the lien avoidance or modification may take place solely within the chapter 13 confirmation process. The plan confirmation order alone will avoid or modify the lien. The debtor need not file a separate motion or adversary proceeding to avoid or modify a lien based on value of the collateral or to reduce the interest rate. An affected lien creditor who wishes to contest said treatment must file a timely objection and appear at the confirmation hearing to prosecute same.

**THIS PLAN:**

☐ DOES ☒ DOES NOT CONTAIN NON-STANDARD PROVISIONS. NON-STANDARD PROVISIONS MUST ALSO BE SET FORTH IN PART 10.

☒ DOES ☐ DOES NOT LIMIT THE AMOUNT OF A SECURED CLAIM BASED SOLELY ON VALUE OF COLLATERAL, WHICH MAY RESULT IN A PARTIAL PAYMENT OR NO PAYMENT AT ALL TO THE SECURED CREDITOR. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

☐ DOES ☒ DOES NOT AVOID A JUDICIAL LIEN OR NONPOSSESSORY, NONPURCHASE-MONEY SECURITY INTEREST. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

Initial Debtor(s)' Attorney

Initial Debtor:

Initial Co-Debtor:

**Part 1: Payment and Length of Plan**

a. The debtor shall pay \$ 1698.00 per month to the Chapter 13 Trustee, starting on September 1, 2018 for approximately 57 months.

b. The debtor shall make plan payments to the Trustee from the following sources:

☒ Future earnings

☐ Other sources of funding (describe source, amount and date when funds are available):

c. Use of real property to satisfy plan obligations:

☐ Sale of real property

Description:

Proposed date for completion: \_\_\_\_\_

☐ Refinance of real property:

Description:

Proposed date for completion: \_\_\_\_\_

☐ Loan modification with respect to mortgage encumbering property:

Description:

Proposed date for completion: \_\_\_\_\_

d. ☐ The regular monthly mortgage payment will continue pending the sale, refinance or loan modification.

e. ☒ Other information that may be important relating to the payment and length of plan:

\$4,236.00 paid to date

**Part 2: Adequate Protection ☒ NONE**

a. Adequate protection payments will be made in the amount of \$ \_\_\_\_\_ to be paid to the Chapter 13 Trustee and disbursed pre-confirmation to \_\_\_\_\_ (creditor).

b. Adequate protection payments will be made in the amount of \$ \_\_\_\_\_ to be paid directly by the debtor(s) outside the Plan, pre-confirmation to: \_\_\_\_\_ (creditor).

**Part 3: Priority Claims (Including Administrative Expenses)**

a. All allowed priority claims will be paid in full unless the creditor agrees otherwise:

Creditor	Type of Priority	Amount to be Paid
CHAPTER 13 STANDING TRUSTEE	ADMINISTRATIVE	AS ALLOWED BY STATUTE
ATTORNEY FEE BALANCE	ADMINISTRATIVE	BALANCE DUE: \$ 3,000.00
DOMESTIC SUPPORT OBLIGATION	N/A	N/A

b. Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount:  
Check one:

☒ None

☐ The allowed priority claims listed below are based on a domestic support obligation that has been assigned to or is owed to a governmental unit and will be paid less than the full amount of the claim pursuant to 11 U.S.C.1322(a)(4):

Creditor	Type of Priority	Claim Amount	Amount to be Paid
	Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount.		

**Part 4: Secured Claims**

**a. Curing Default and Maintaining Payments on Principal Residence:** ☐ NONE

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor shall pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)
US Bank NA Trustee c/o Caliber Home Loans	First Mortgage	\$76542.31	\$8,027.00	\$84,569.31	As Billed

**b. Curing and Maintaining Payments on Non-Principal Residence & other loans or rent arrears:** ☒ NONE

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor will pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)

**c. Secured claims excluded from 11 U.S.C. 506:** ☒ NONE

The following claims were either incurred within 910 days before the petition date and are secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor(s), or incurred within one year of the petition date and secured by a purchase money security interest in any other thing of value:

Name of Creditor	Collateral	Interest Rate	Amount of Claim	Total to be Paid through the Plan Including Interest Calculation

**d. Requests for valuation of security, Cram-down, Strip Off & Interest Rate Adjustments ☐ NONE**

1.) The debtor values collateral as indicated below. If the claim may be modified under Section 1322(b)(2), the secured creditor shall be paid the amount listed as the "Value of the Creditor Interest in Collateral," plus interest as stated. The portion of any allowed claim that exceeds that value shall be treated as an unsecured claim. If a secured claim is identified as having "NO VALUE" it shall be treated as an unsecured claim.

**NOTE: A modification under this Section ALSO REQUIRES the appropriate motion to be filed under Section 7 of the Plan.**

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor Interest in Collateral	Annual Interest Rate	Total Amount to be Paid
US Bank NA c/o Specialized Loan Servicing	Second Mortgage on 14 Zeek Way, Hopatcong, NJ	\$33,321.81	\$140,000.00	345,558.91	\$0.00	0.00	\$0.00

2.) Where the Debtor retains collateral and completes the Plan, payment of the full amount of the allowed secured claim shall discharge the corresponding lien.

**e. Surrender ☒ NONE**

Upon confirmation, the stay is terminated as to surrendered collateral only under 11 U.S.C. 362(a) and that the stay under 11 U.S.C 1301 be terminated in all respects. The Debtor surrenders the following collateral:

Creditor	Collateral to be Surrendered	Value of Surrendered Collateral	Remaining Unsecured Debt

**f. Secured Claims Unaffected by the Plan ☒ NONE**

The following secured claims are unaffected by the Plan:



<b>g. Secured Claims to be Paid in Full Through the Plan:</b> <input checked="" type="checkbox"/> NONE		
Creditor	Collateral	Total Amount to be Paid Through the Plan

<b>Part 5: Unsecured Claims</b> <input type="checkbox"/> NONE
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**a. Not separately classified** allowed non-priority unsecured claims shall be paid:

☐ Not less than \$ \_\_\_\_\_ to be distributed *pro rata*

☐ Not less than \_\_\_\_\_ percent

☒ *Pro Rata* distribution from any remaining funds

**b. Separately classified unsecured claims** shall be treated as follows:

Creditor	Basis for Separate Classification	Treatment	Amount to be Paid

<b>Part 6: Executory Contracts and Unexpired Leases</b> <input checked="" type="checkbox"/> NONE				
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(NOTE: See time limitations set forth in 11 U.S.C. 365(d)(4) that may prevent assumption of non-residential real property leases in this Plan.)

All executory contracts and unexpired leases, not previously rejected by operation of law, are rejected, except the following, which are assumed:

Creditor	Arrears to be Cured in Plan	Nature of Contract or Lease	Treatment by Debtor	Post-Petition Payment

**Part 7: Motions** ☐ NONE

**NOTE:** All plans containing motions must be served on all potentially affected creditors, together with local form, *Notice of Chapter 13 Plan Transmittal*, within the time and in the manner set forth in D.N.J. LBR 3015-1. A *Certification of Service, Notice of Chapter 13 Plan Transmittal and valuation* must be filed with the Clerk of Court when the plan and transmittal notice are served.

**a. Motion to Avoid Liens Under 11. U.S.C. Section 522(f).** ☒ NONE

The Debtor moves to avoid the following liens that impair exemptions:

Creditor	Nature of Collateral	Type of Lien	Amount of Lien	Value of Collateral	Amount of Claimed Exemption	Sum of All Other Liens Against the Property	Amount of Lien to be Avoided

**b. Motion to Avoid Liens and Reclassify Claim from Secured to Completely Unsecured.** ☐ NONE

The Debtor moves to reclassify the following claims as unsecured and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor's Interest in Collateral	Total Amount of Lien to be Reclassified
US Bank NA c/o Specialized Loan Sercing	Second Mortgage: 14 Zeek Way, Hopatcong, NJ	\$33,321.81	\$140,000.00	\$345,558.91	\$0.00	\$33,321.81

**c. Motion to Partially Void Liens and Reclassify Underlying Claims as Partially Secured and Partially Unsecured. ☒ NONE**

The Debtor moves to reclassify the following claims as partially secured and partially unsecured, and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Amount to be Deemed Secured	Amount to be Reclassified as Unsecured

**Part 8: Other Plan Provisions**

**a. Vesting of Property of the Estate**

☒ Upon confirmation

☐ Upon discharge

**b. Payment Notices**

Creditors and Lessors provided for in Parts 4, 6 or 7 may continue to mail customary notices or coupons to the Debtor notwithstanding the automatic stay.

**c. Order of Distribution**

The Standing Trustee shall pay allowed claims in the following order:

1) Ch. 13 Standing Trustee commissions

2) Administrative/Priority Claims

3) Secured Claims

4) Unsecured Claims

**d. Post-Petition Claims**

The Standing Trustee ☐ is, ☒ is not authorized to pay post-petition claims filed pursuant to 11 U.S.C. Section 1305(a) in the amount filed by the post-petition claimant.



**Part 9: Modification** ☐ NONE

If this Plan modifies a Plan previously filed in this case, complete the information below.

Date of Plan being modified: 05/01/2018.

Explain below **why** the plan is being modified:

The plan is being modified to pay the higher claim of the first mortgage holder and to clarify treatment of the second mortgage holder, as both the first and the second have the same name.

Explain below **how** the plan is being modified:

The plan is being modified to pay the higher claim of the first mortgage holder and to clarify treatment of the second mortgage holder.

Are Schedules I and J being filed simultaneously with this Modified Plan?

☐ Yes

☒ No

**Part 10: Non-Standard Provision(s): Signatures Required**

Non-Standard Provisions Requiring Separate Signatures:

☒ NONE

☐ Explain here:

Any non-standard provisions placed elsewhere in this plan are void.

The Debtor(s) and the attorney for the Debtor(s), if any, must sign this Certification.

I certify under penalty of perjury that the plan contains no non-standard provisions other than those set forth in this final paragraph.

Date: 08/23/18

  
Attorney for the Debtor

Date: 8/22/18

  
Debtor

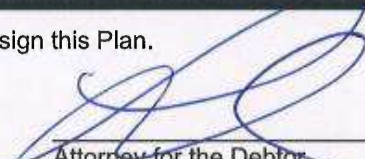
Date: \_\_\_\_\_

\_\_\_\_\_  
Joint Debtor

### Signatures


The Debtor(s) and the attorney for the Debtor(s), if any, must sign this Plan.

Date: 08/23/18

  
\_\_\_\_\_  
Attorney for the Debtor

I certify under penalty of perjury that the above is true.

Date: 8/23/18

  
\_\_\_\_\_  
Debtor

Date: \_\_\_\_\_

\_\_\_\_\_  
Joint Debtor

**Certificate of Notice Page 11 of 12**  
 United States Bankruptcy Court  
 District of New Jersey

In re:  
 Jorge L. Paredes  
 Debtor

Case No. 18-18975-SLM  
 Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0312-2

User: admin  
 Form ID: pdf901

Page 1 of 2  
 Total Noticed: 38

Date Rcvd: Sep 04, 2018

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 06, 2018.

db +Jorge L. Paredes, 14 Zeek Way, Hopatcong, NJ 07843-1334  
 cr +U.S. Bank Trust, N.A., as Trustee for LSF9 Master, 13801 Wireless Way,  
 Oklahoma City, OK 73134-2500  
 517493472 ++DIRECTV LLC, ATTN BANKRUPTCIES, PO BOX 6550, GREENWOOD VILLAGE CO 80155-6550  
 (address filed with court: Direct TV, PO Box 78626, Phoenix, AZ 85062)  
 517493474 +Esurance, All State Insurance, PO Box 12055, Roanoke, VA 24022-2055  
 517493475 +First Premier Bank, 601 S Minnesota Ave, Sioux Falls, SD 57104-4868  
 517493477 +IC Systems, Attn Bankruptcy, 444 Highway 96 East, PO Box 64378,  
 Saint Paul, MN 55164-0378  
 517493478 +Matrix Acquisitions LLC, 126 Dwight Park Circle, Syracuse, NY 13209-1067  
 517493479 +NCB, Attn: Bankruptcy, One Allied Drive, Treviso, PA 19053-6945  
 517493482 +Specialized Loan Servicing LLC, 8742 Lucent Blvd, Suite300, Highlands Ranch, CO 80129-2386  
 517493483 +Steven Kelly Esq., Stern & Eisenberg PC, 1040 N Kings Highway, Suite 407,  
 Cherry Hill, NJ 08034-1925  
 517493484 ++T MOBILE, C O AMERICAN INFOSOURCE LP, 4515 N SANTA FE AVE, OKLAHOMA CITY OK 73118-7901  
 (address filed with court: T-Mobile, Bankruptcy Department, PO Box 53410,  
 Bellevue, WA 98015)  
 517493485 +T-Mobile USA/American Info Source, 4515 N Santa Fe Avenue, Oklahoma City, OK 73118-7901  
 517563295 +U.S. Bank National Association Trustee (See 410), c/o Specialized Loan Servicing LLC,  
 8742 Lucent Blvd, Suite 300, Highlands Ranch, Colorado 80129-2386  
 517493489 +US Bank Trust NA, PO Box 24330, Oklahoma City, OK 73124-0330  
 517493488 +US Bank Trust as Trustee for LSF9, Master Participation Trust, Stern & Eisenberg PC,  
 1040 N Kings Highway, Suite 407, Cherry Hill, NJ 08034-1925  
 517493486 +Udren Law Offices, Woodcrest Corporate Center, 111 Woodcrest Road, Suite 200,  
 Cherry Hill, NJ 08003-3620  
 517493487 +United Rev, National Event Services EMS, PO Box 1184, Langhorne, PA 19047-6184

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

smg E-mail/Text: usanj.njbankr@usdoj.gov Sep 04 2018 23:41:37 U.S. Attorney, 970 Broad St.,  
 Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534  
 smg +E-mail/Text: ustpreion03.ne.ecf@usdoj.gov Sep 04 2018 23:41:34 United States Trustee,  
 Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100,  
 Newark, NJ 07102-5235  
 517493467 +E-mail/Text: bankruptcy\_notifications@ccsusa.com Sep 04 2018 23:42:26 Allstate Insurance,  
 PO Box 55126, Boston, MA 02205-5126  
 517493468 +E-mail/Text: ECMBKMail@Caliberhomeloans.com Sep 04 2018 23:42:38 Caliber Home Loans,  
 US Bank Trust, PO Box 24330, Oklahoma City, OK 73124-0330  
 517493469 +E-mail/Text: bankruptcy@cavps.com Sep 04 2018 23:41:56 Calvary SPV II, LLC,  
 GE Money Bank/Walmart, 500 Summit Lake Drive, Ste 400, Valhalla, NY 10595-2321  
 517493470 +E-mail/PDF: AIS.cocard.ebn@americaninfosource.com Sep 04 2018 23:46:39 Capital One,  
 Attn: Bankruptcy, PO Box 30285, Salt Lake City, UT 84130-0285  
 517514174 +E-mail/Text: bankruptcy@cavps.com Sep 04 2018 23:41:56 Cavalry SPV II, LLC,  
 500 Summit Lake Drive, Ste 400, Valhalla, NY 10595-2321  
 517493471 +E-mail/Text: bankruptcy\_notifications@ccsusa.com Sep 04 2018 23:42:26  
 Credit Collection Services, PO Box 773, Needham Heights, MA 02494-0918  
 517493473 +E-mail/PDF: EBN\_AIS@AMERICANINFOSOURCE.COM Sep 04 2018 23:47:18 Direct TV LLC,  
 American InfoSource LP, 4515 N Santa Fe Avenue, Oklahoma City, OK 73118-7901  
 517493476 +E-mail/PDF: gecsedirecoverycorp.com Sep 04 2018 23:47:02 GE Money Bank, PO Box 96001,  
 Orlando, FL 32896-0001  
 517594190 +E-mail/Text: bankruptcydpt@mcmcg.com Sep 04 2018 23:41:33 Midland Funding LLC,  
 PO Box 2011, Warren, MI 48090-2011  
 517493481 E-mail/PDF: PRA\_BK2\_CASE\_UPDATE@portfoliorecovery.com Sep 04 2018 23:47:08  
 Portfolio Recovery Associates, c/o Orchard Bank, POBox 41067, Norfolk, VA 23541  
 517493480 +E-mail/PDF: PRA\_BK2\_CASE\_UPDATE@portfoliorecovery.com Sep 04 2018 23:46:41  
 Portfolio Recover Associates LLC, 140 Corporate Blvd, Norfolk, VA 23502-4952  
 517630073 +E-mail/Text: JCAP\_BNC\_Notices@jcap.com Sep 04 2018 23:41:52 Premier Bankcard, Llc,  
 Jefferson Capital Systems LLC Assignee, PO Box 7999, Saint Cloud Mn 56302-7999  
 517494833 +E-mail/PDF: gecsedirecoverycorp.com Sep 04 2018 23:46:35 Synchrony Bank,  
 c/o of PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021  
 517631871 +E-mail/Text: ECMBKMail@Caliberhomeloans.com Sep 04 2018 23:42:37  
 U.S. Bank Trust, N.A., AS Trustee for LSF9 Master, c/o Caliber Home Loans,  
 13801 Wireless Way, Oklahoma City, OK 73134-2500  
 517493491 +E-mail/Text: wfmelectronicbankruptcynotifications@verizonwireless.com Sep 04 2018 23:40:37  
 Verizon, PO Box 650584, Dallas, TX 75265-0584  
 517493490 +E-mail/Text: wfmelectronicbankruptcynotifications@verizonwireless.com Sep 04 2018 23:40:37  
 Verizon, Verizon Wireless Bk Admin, 500 Technology Dr Ste 550,  
 Weldon Springs, MO 63304-2225  
 517623605 +E-mail/PDF: EBN\_AIS@AMERICANINFOSOURCE.COM Sep 04 2018 23:46:21 Verizon,  
 by American InfoSource LP as agent, 4515 N Santa Fe Ave, Oklahoma City, OK 73118-7901  
 517493492 +E-mail/PDF: EBN\_AIS@AMERICANINFOSOURCE.COM Sep 04 2018 23:47:17  
 Verizon by American InfoSource, 4515 N Santa Fe Avenue, Oklahoma City, OK 73118-7901  
 517493493 +E-mail/PDF: gecsedirecoverycorp.com Sep 04 2018 23:46:05 Walmart, Attn: Bankruptcy,  
 PO Box 103104, Roswell, GA 30076-9104

TOTAL: 21

District/off: 0312-2

User: admin  
Form ID: pdf901

Page 2 of 2  
Total Noticed: 38

Date Rcvd: Sep 04, 2018

\*\*\*\*\* BYPASSED RECIPIENTS (continued) \*\*\*\*\*

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '++' were redirected to the recipient's preferred mailing address  
pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Sep 06, 2018

Signature: /s/Joseph Speetjens

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 24, 2018 at the address(es) listed below:

Marie-Ann Greenberg magecf@magtrustee.com  
Nicholas Fitzgerald on behalf of Debtor Jorge L. Paredes nickfitz.law@gmail.com  
Rebecca Ann Solarz on behalf of Creditor U.S. Bank National Association, as Indenture Trustee  
of the GMACM Home Equity Loan Trust 2006-HE4 rsolarz@kmlawgroup.com  
Sarah J. Crouch on behalf of Debtor Jorge L. Paredes nickfitz.law@gmail.com,  
nadiafinanciamail@gmail.com;fitzgeraldnj@stratusbk.com;sarah@fitzgeraldcrouchlaw.com  
Sindi Mncina on behalf of Creditor U.S. Bank Trust, N.A., as Trustee for LSF9 Master  
Participation Trust smncina@rascrane.com  
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov  
Veroneque Annette Theresa Blake on behalf of Creditor U.S. Bank Trust, N.A., as Trustee for  
LSF9 Master Participation Trust vblake@udren.com, vbarber@udren.com

TOTAL: 7